

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

DEBORAH CHIN, On Behalf of Herself and All )  
Others Similarly Situated, ) Case No. 04 cv 10294 (DPW)  
)  
Plaintiff, )  
)  
v. )  
)  
SONUS NETWORKS, INC., et al. )  
)  
Defendants. )  
\_\_\_\_\_ )

DANIEL WILLIAMS, )  
)  
Plaintiff, )  
)  
v. ) Case No. 04 cv 10359  
)  
)  
HASSAN M. AHMED, et al., )  
)  
Defendants, )  
)  
v. )  
)  
SONUS NETWORKS, INC., )  
\_\_\_\_\_ )

THIS DOCUMENT RELATES TO CASE NOS.:

04 cv 10307; 04 cv 10308; 04 cv 10309;  
04 cv 10310; 04 cv 10329; 04 cv 10333;  
04 cv 10345; 04 cv 10346; 04 cv 10359;  
04 cv 10362; 04 cv 10363; 04 cv 10364;  
04 cv 10382; 04 cv 10383; 04 cv 10384;  
04 cv 10454; 04 cv 10576; 04 cv 10597;  
04 cv 10612; 04 cv 10623; 04 cv 10714;  
04 cv 10314 (MLW); 04 cv 11315 (MLW)

**[PROPOSED] ORDER CONSOLIDATING SHAREHOLDER DERIVATIVE CASES  
AND APPOINTING LEAD COUNSEL**

This Court, having considered the Motion of Daniel Williams for Appointment of Federman & Sherwood as Lead Derivative Counsel and the Law Office of Alan L. Kovacs as Liaison Derivative Counsel in the derivative case styled *Williams v. Ahmed, et. al.*, Case No. 04 cv 10359 (the “*Williams* action”), for good cause shown, hereby orders as follows:

IT IS HEREBY ORDERED THAT

1. The following derivative actions are hereby consolidated under *Williams v. Ahmed, et al.*:  
  
*Williams v. Ahmed, et al.*, Case No. 04 cv 10359  
  
*Burk v. Ahmed, et al.*, Case No. 01 cv 20384  
  
*Pisnoy v. Ahmed, et al.*, Case No. 104 cv 10576
2. The law firm of Federman & Sherwood is appointed Lead Derivative Counsel in these derivative actions and any related derivative action subsequently filed in this Court.
3. The Law Office of Alan L. Kovacs is appointed Liaison Derivative Counsel in these derivative actions and any related derivative action subsequently filed in this Court.
4. Any related derivative actions subsequently filed in this Court shall be consolidated with the *Williams* action.

DATED: \_\_\_\_\_

\_\_\_\_\_  
HONORABLE DOUGLAS P. WOODLOCK  
UNITED STATES DISTRICT COURT JUDGE